

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MICHAEL A. LEE, JR.

Plaintiff,

Case No : 22-cv-0930

v.

GINA AMBASAN,

Defendant.

**DECLARATION OF KIMBERLEY CY. MOTLEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR SANCTIONS**

Pursuant to 28 U.S.C. § 1746, the undersigned, Kimberley Cy. Motley., makes the following statements under penalty of perjury under the laws of the United States.

1. I am an attorney duly licensed to practice law in the State of Wisconsin and before this Court.
2. I represent the Plaintiff Michael A. Lee, Jr. in the above-captioned case.
3. This Declaration is made in support of statements and representations made in Plaintiffs' Motion for Sanctions.
4. Attached hereto and incorporated herein as Exhibit 1 is Defendant's Response to Plaintiffs Second Request for Admissions.
5. Attached hereto and incorporated herein as Exhibit 2 is the Wisconsin Circuit Court Access publicly available court entry for criminal case 2023-CF-0210.

6. Attached hereto and incorporated herein as Exhibit 3 is Defendant's Response to Plaintiffs Second Request for Admissions.

Executed this 28th day of March 2024.

/s/Kimberley Cy. Motley
Kimberley Cy. Motley